

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:16 CR 481 RLW (PLC)
)	
DANIEL STIMMEL,)	
)	
)	
Defendant.)	

MOTION TO TRAVEL

COMES NOW Defendant, Daniel Stimmel, by and through attorney Jason Korner to request that he be allowed to travel. Defendant states the following in support of this motion:

1. Defendant is currently on bond.
2. If permitted to travel, Defendant will fly from the airport in Charleston, South Carolina to Delaware, Ohio on June 30, 2017. Defendant would then return to South Carolina, on July 5, 2017.
3. The purpose for this travel is for Defendant to visit his daughter.
4. While in Ohio, Defendant would stay with his daughter at 554 Eagle Walk Road, Delaware, Ohio, 43015.
5. Defendant also requests permission to travel to attend a family reunion in Mount Lookout, West Virginia, departing on July 13, 2017 and returning to South Carolina on July 17, 2017.
6. While in West Virginia, Defendant would stay at 35 Evans Lane, Mount Lookout, West Virginia 26678.
7. The Government, through Assistant United States Attorney Tom Albus, does not

oppose this motion.

8. The Pretrial Services Office has no general objection to this motion, but did want it brought to the Court's attention that these travel dates include dates during and after Defendant's currently scheduled trial.

9. Defense counsel anticipates scheduling a plea date prior to the current trial date. If this motion is granted by the Court, Defendant understands these conditions only remain in effect if Defendant is allowed to remain on pretrial release pending sentencing in this case.

WHEREFORE, Defendant requests this Honorable Court allow Defendant to travel to the above-listed destination during the above-listed dates, and to then return to his home in South Carolina as set out in this motion.

Respectfully submitted,

THE LAW OFFICE OF JASON A. KORNER

/s/ Jason A. Korner

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Certificate of Service

The undersigned hereby certifies that on this 20th day of June, 2017, a true and accurate copy of the foregoing was served on all parties of record via the Court's electronic filing system.

/s/ Jason A. Korner